

## **EXHIBIT 1**

1           IN THE CIRCUIT COURT FOR THE COUNTY OF DALLAS, ALABAMA  
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3       TRAVARIS D. SMITH,  
4                               Plaintiff,  
5               vs.                       Case No. 27-cv-16-900273  
6       FORD MOTOR COMPANY, et al.,  
7                               Defendants.

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11       The Videotaped Videoconference Deposition of  
12       ROBERT PASCARELLA,  
13       Taken at 211 West Fort Street, Suite 261,  
14       Detroit, Michigan,  
15       Commencing at 11:26 a.m.,  
16       Tuesday, October 2, 2018,  
17       Before Kathryn L. Janes, CSR-3442, RMR, RPR.

1 Q. And at some point, you changed and moved into  
2 engineering?

3 A. I did.

4 Q. And in about 1989, is that about the time you finished  
5 engineering?

6 A. I graduated with my bachelor's in mechanical  
7 engineering in March of 1989.

8 Q. After you graduated in '89, did you go to work for  
9 Ford Motor Company sometime shortly thereafter?

10 A. I did in April.

11 Q. And how long did you -- and I do know, and we kind of  
12 jumped forward, you ultimately worked with a gentleman  
13 I deposed yesterday and have deposed on many  
14 occasions, Don Tandy?

15 A. I worked for Tandy Engineering and I don't know all  
16 the legal connotations, but my understanding is that  
17 he owned that company.

18 Q. And it's my understanding that you and Mr. Tandy for a  
19 short period of time both had -- both worked at Ford  
20 and did work on the Ford Explorer?

21 A. We worked in light truck and that would have included  
22 work on the Ford Explorer.

23 Q. So but both you and him at some period of time while  
24 you all was at Ford worked on the Ford Explorer?

25 A. It wasn't always concurrent. He preceded me and then

1           it was, and then by the time I left Mr. Tandy, it was  
2           a much smaller percentage, so I can really only  
3           testify on the work that I did.

4       Q.   Mr. Tandy has told us that he believes he's  
5           approximately made in cases almost solely related to  
6           Ford work and SUV rollovers, approximately  
7           \$75 million, were you aware of that?

8       A.   I'm not aware of the exact figures, but I know they  
9           are talked about what Tandy Engineering had billed  
10          Ford. And I don't believe that's what Mr. Tandy had  
11          made, I think that's total billing whether vehicles --

12      Q.   Would you understand --

13      A.   -- or test tracks, but again, you can ask Mr. Tandy  
14          those questions, he would know better than I would.

15      Q.   Would you understand that since you're aware of what's  
16          been billed for, how much do -- how much do you recall  
17          that you're aware of that Tandy Engineering billed for  
18          Ford for work they did?

19      A.   I just know at a point in time somebody had asked me  
20          questions similar to what you're asking and said  
21          something in excess of \$50 million over a ten or 12  
22          year period, that's what I generally recall, but I've  
23          never seen the numbers personally.

24      Q.   And you've never seen the interrogatory response  
25          showing how much Tandy Engineering had made?

1 tell me that because of technology changes and  
2 advances in technology there are fewer rollovers in  
3 SUVs now, is that what you told me earlier?

4 A. I'm saying I have fewer cases, I don't know the  
5 statistics, I have not evaluated those.

6 Q. You haven't evaluated whether or not the modern SUVs  
7 like the 2017, 2018 Ford Explorers are rolling over  
8 less than say, for example, the 1998 Ford Explorer?

9 A. I have not looked at those numbers, no, sir.

10 Q. Nevertheless, though, when there are cases involved in  
11 the Ford Explorer, you are oftentimes called in to  
12 assist because you played a role in evaluating and  
13 testing of Ford Explorers; would that be fair?

14 A. I don't necessarily believe so. I think generally our  
15 group, however broken up, is with my background in  
16 vehicle dynamics, any particular claims or allegations  
17 that come in regarding steering, ride, handling,  
18 braking, I generally get those. That's how the  
19 workload --

20 Q. I thought --

21 A. -- is spread out.

22 Q. I thought that's what I said. Is it -- isn't it a  
23 fact because of your experience with the Ford  
24 Explorer, being more specific, you actually signed off  
25 on some Ford Explorers from a resistance to rollover

1           standpoint; is that correct?

2       A.   For a portion of the rollover resistance requirements,  
3           I did.

4       Q.   Okay. Is it -- so don't routinely or not routinely,  
5           but don't on occasions you provide testimony as it  
6           relates to Ford's resistance to rollover SUVs, the  
7           Explorers?

8       A.   If it's a case that's assigned to me and I've been  
9           asked to investigate and provide that testimony, I  
10          have.

11      Q.   Who else does that type of work if a case involves a  
12          Ford Explorer and issues arise related to ADAMS, who  
13          else would be assigned to that type work, because I've  
14          never seen anybody but you, I've never deposed anybody  
15          but you?

16      A.   Well, other people have been deposed in that manner at  
17          Ford Motor Company, fact witnesses and even corporate  
18          witnesses, I believe fellow DA, Mr. Eric Kalis, has  
19          been deposed in those cases, so I'm not assigned to  
20          all of them.

21      Q.   Eric who?

22      A.   Eric Kalis.

23      Q.   Is he presently there?

24      A.   He is.

25      Q.   And is your understanding on some Ford Explorer cases